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6
7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF CALIFORNIA
9

10 PEOPLE OF THE STATE OF CALIFORNIA, CR 14-196 CRB

11 Plaintiff,

12 v.

PROPOSED QUESTIONS FOR *IN*
CAMERA EXAMINATION OF
13 INFORMANTS

14 KWOK CHEUNG CHOW,

15 Defendant.

Date: November 2, 2015
Time: 9:30 a.m.
Hon. Judge Charles Breyer

16 KWOK CHEUNG CHOW respectfully requests this Court to utilize
17 the following as a basis for examination each of the five
18 requested informants and/or confidential sources, respectively,
19 pursuant to defendant's Roviaro motion.

20 Dated: October 28, 2015

21
22 /s/ CURTIS BRIGGS

23 J. TONY SERRA
CURTIS BRIGGS
24 TYLER SMITH
Attorneys for Defendant
25 KWOK CHEUNG CHOW
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GENERAL PROPOSED QUESTIONS FOR *IN CAMERA*
EXAMINATION OF INFORMANTS TO BE PRESENTED TO
EACH OF THE FIVE INFORMANTS/CONFIDENTIAL
WITNESSES

1. Do you know Mr. Kwok Chow, also known as Raymond "Shrimp Boy" Chow? Please describe how long you have known him and the nature of your relationship.
 - a. When did you first meet him?
 - b. Under what circumstances did you meet?
 - c. Were you working for the government as an informant when you first met Raymond?
2. Had you ever heard about Raymond Chow before being introduced to him? If so:
 - a. From whom?
 - b. What have you heard about him?
3. With regard to item 2 above, did you provide information to law enforcement about him? If so:
 - a. When did you provide this information?
 - b. What specific information did you tell law enforcement?
4. Did you cooperate with the government in this case, including providing information on Raymond Chow? If so, then:
 - a. Did you receive any monetary compensation for your cooperation? If so, how much?
 - b. Were you offered any other benefits or promises of leniency for your cooperation?
 - c. Were you threatened in any way by law enforcement?
5. What specifically were you offered in terms of the above noted benefits? Who were the specific officers that offered

1 you these benefits?

2 6. What information did you provide them that is not listed in
3 the above questions?

4 7. Have you previously provided law enforcement with
5 information that has led to narcotics being seized and
6 persons arrested? If so:

7 a. On how many occasions?

8 b. What benefits did you receive?

9 c. What officers did you provide this information to?

10 d. In what jurisdiction did you provide this information?

11 8. How many times have you been arrested?

12 a. What dates?

13 b. What were you arrested for?

14 c. Were you Mirandized? [explain]

15 d. Did you waive your rights?

16 e. Do you know the officers who arrested you? If so:

17 (1) How do you know them?

18 (2) How long have you known them?

19 f. Do you have any felony convictions? If so:

20 (1) What county?

21 (2) What years?

22 (3) What types of felonies?

23 g. Do you have any misdemeanor convictions? If so:

24 (1) What county?

25 (2) What years?

26 (3) What types of misdemeanors?

27 9. How many other times have you provided law enforcement with
28 information that has led to seizures and persons being

1 arrested?

2 a. Describe each and every occasion.

3 b. List each agency to whom you provided the information.

4 10. Have you ever used drugs? If so:

5 a. What kind?

6 b. How long did you use these drugs for?

7 c. Have you used drugs in the last thirty days? In the
8 last sixty days? In the last ninety days? In the last
9 six months?

10 d. Are you currently using drugs?

11 e. Are you addicted to or dependent on drugs? If so, what
12 kind?

13 f. Have you previously been addicted to or dependent on
14 drugs? If so, what kind and when?

15 h. Were you under the influence of any drugs at the time
16 when you provided any information to law enforcement?

17 If so, what kind and when?

18 11. Isn't it a fact that you never observed Raymond Chow
19 involved or participating in any illegal activity?

20 12. Did you tell agents of the DEA and/or any other law
21 enforcement personnel false information with regard to
22 Raymond Chow's activity as related to the present charges,
23 on any occasion?

24 a. When did you provide the above information?

25 b. Who else was present when you provided this
26 information?

27 c. Was your interview tape recorded?

28 d. Did you make any written statements regarding the above

1 information?

2 e. With regard to each officer you spoke with, which
3 specific officer did you provide information to on each
4 of the above questions?

5 f. Give the dates, and if you cannot specifically recall,
6 please approximate the dates as to each occasion you
7 gave information.

8 g. Please answer questions from above specifically with
9 regard to the content of each conversation to law
10 enforcement on each occasion you provided information.

11 13. Isn't it true that you did not have personal knowledge that
12 Raymond Chow was involved in any racketeering-related
13 activity?

14 14. Isn't it true that Raymond is a law-abiding member of the
15 community and consistently avoided persons and activities
16 that could be deemed illegal? If you disagree, state the
17 date or approximate date, that you allege Raymond Chow
18 engaged in illegal acts.

19 15. Isn't it true that Raymond Chow advocated for the youth of
20 the Chinatown community and promoted upstanding Chinese
21 values?

22 16. What is your psychological history?

23 a. Have you been treated for any psychological illness?

24 If so,

25 b. Who is your doctor?

26 c. When were you first diagnosed?

27 17. What was your mental condition at the time the police
28 officers talked to you?

- 1 18. Were you then suffering what is akin to a nervous breakdown?
2 a. Have you ever suffered from one? If so when.
3 b. Have you ever been hospitalized for mental health
4 issues?
5 c. Have you ever been diagnosed for mental health issues?
6 If so what is the diagnosis?
- 7 19. Have you ever been to rehabilitation for drugs? If so when?
8 Please describe.
- 9 20. Have you ever been to rehabilitation for alcohol? If so
10 when? Please describe.
- 11 21. Have you ever been to rehabilitation for mental health
12 issues? If so when? Please describe.
- 13 22. Are you currently facing any pending criminal charges? If
14 so please describe.
- 15 23. Are you presently selling drugs?
- 16 24. Are you presently providing information to law enforcement?
17 If so please describe.
- 18 25. Do you hold any ill-will or negative feelings toward Raymond
19 Chow in any way? If so, please explain.
- 20 26. Do you hold any ill-will or negative feelings toward any of
21 Raymond Chow's co-defendants in any way? If so, please
22 explain.
- 23 27. Has there ever been a disagreement between you or someone
24 close to you and Raymond Chow, whether on a personal or
25 business level? If so, please describe.
- 26 28. Do you assert that you have absolutely no personal bias or
27 vendetta against Raymond Chow for anything that occurred in
28 your or in his past? If you do not assert this, please

1 explain why.

2 MURDER OF ALLEN LEUNG - SPECIFIC TO EACH
3 CONFIDENTIAL SOURCE

4 ***(Confidential Informant/Witness "A" and "B")***

- 5 1. What was your relationship with Mr. Chow?
- 6 2. Did you meet at a restaurant in Oakland with Mr. Chow late
7 in 2005 and early 2006?
- 8 a. Who else was present at the restaurant?
- 9 b. What did you discuss?
- 10 c. What did Chow say with regard to Allen Leung? What
11 specifically did Chow say with regard to killing Leung?
12 Please explain in detail.
- 13 5. Did you have any role or involvement in the murder of Leung?
14 What was your role?
- 15 6. Where were on the night of February 2, 2006?
- 16 7. Where were you 2-3 days prior to February 2, 2006?
- 17 8. Do you know who killed Allen Leung?
- 18 9. Do you know of any persons with a vendetta against Allen
19 Leung?
- 20 10. Isn't it true that Mr. Chow never asked you, directly or
21 indirectly, to murder Allen Leung or any other person?

22 ***Confidential Informant/Witness "C"***

- 23 1. Were you asked to kill Leung?
- 24 2. Who asked you to kill Leung?
- 25 3. Do you have a vendetta against Chow?
- 26 a. Specifically, did you tell the Government that you are
27 angry because you do not feel that Chow provided sufficient
28 legal support for you?

- 1 4. What was your role in the murder of Leung?
- 2 5. Did you meet at a hotel a few days prior to February 2,
- 3 2006?
- 4 6. Who was at the hotel?
- 5 7. What was discussed at the hotel in context of the murder?
- 6 8. Did you drive two men into Chinatown on February 2, 2006?
- 7 a. Who were the men?
- 8 b. Where were they coming from?
- 9 c. What did you discuss in the car ride?
- 10 d. Did the men get out of the car?
- 11 i. How long were they gone?
- 12 ii. What did they say when they returned?
- 13 iii. Did they have guns and what did they do with the
- 14 guns?
- 15 9. What was your relationship with Chow?
- 16 10. Isn't it true that Mr. Chow never asked you, directly or
- 17 indirectly, to murder Allen Leung or any other person?

18 ***Confidential Informant/Witness "D" and "E"***

- 19 1. What was your relationship with Mr. Chow?
- 20 2. Did you meet with Chow a few days prior to February 2, 2006?
- 21 a. Who was present at this meeting?
- 22 b. Where did this meeting take place?
- 23 c. What did Chow say with regard to Allen Leung? What
- 24 specifically did Chow say with regard to killing Leung?
- 25 Please explain in detail.
- 26 3. Did you travel from out of town for this meeting?
- 27 a. Where did you come from?
- 28 4. Did you have any role or involvement in the murder of Leung?

1 What was your role?

2 5. Where were on the night of February 2, 2006?

3 a. Did you drive into Chinatown of February 2, 2006?

4 b. Who else was in the car?

5 c. Did you exit the car in Chinatown?

6 i. Where did you go?

7 ii. What did you do?

8 6. Did you shoot Leung?

9 7. Do you know who killed Allen Leung?

10 8. Do you know of any persons with a vendetta against Allen
11 Leung?

12 9. Isn't it true that Mr. Chow never asked you, directly or
13 indirectly, to murder Allen Leung or any other person?

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